

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UNITED STATES OF AMERICA)	
)	
)	
v.)	Case no. 1:14-CR-306-GBL - 8
)	
)	
MANUEL E. PAIZ GUEVARA)	

**DEFENDANT’S MOTION FOR SCHEDULING ORDER IN
COMPLAINEE WITH FEDERAL DEATH PENALTY PROTOCOL**

COMES NOW, MANUEL E. PAIZ GUEVARA, hereinafter referred to as Defendant, by and through counsel, and moves the Court to establish and issue a scheduling order which sets forth a schedule for the presentation of mitigating evidence to the local United States Attorney for the Eastern District of Virginia and to the United States Department of Justice Capital Case Unit (“CCU”) in Washington, D. C., FOR THE TIME FOR FILING OF THE Government’s Notification of Intent to Seek the Death Penalty, and for the trial date. The Defendant requests such a scheduling order with the understanding that scheduling extensions may be necessary in order for the defense to fully prepare and investigate the case for authorization meeting with the United States Attorney and the United States Department of Justice.

The pending indictment contains allegations of violent conduct alleged to be associated with a Central American gang. Many suspect and witnesses only speak Spanish and will necessitate coordination of interpreters. Investigation will entail speaking with as many family members as can be identified. It is unknown if foreign travel will be necessary, at this time.

This Court has the authority to ensure to establish a schedule for the presentation of mitigating evidence to the United States Attorney and the CCU. The defendant would respectfully request that this Court enter the following proposed schedule:

Defense Presentation to the U.S. Attorney	May 1, 2015 ⁶
Defense Presentation to the CCU	June 15, 2015
Filing of Government's Intent	
To Seek the Death Penalty	August 15, 2015
Trial	At least six (6) months Following the Notice of Intent

The grounds for this motion are more fully set forth in the attached memorandum in support. A proposed order is also attached as per the local rule.

Respectfully submitted,

MANUEL E. PAIZ GUEVARA

By: _____(s)_____

David P. Baugh, Esq.
Va. Bar No. 22528
2025 East Main Street, Suite 108
Richmond, Virginia 23224
804.743-8111
Email: dpbaugh@dpbaugh.com

W. Michael Chick, Jr. Esq.
Law Offices of W. Michael Chick, Jr.
10513 Judicial Drive, Suite 102
Fairfax, Virginia 22030
571.276.8279
Email: mike@chichlawfirm.com
ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing Motion for Designation of Law Enforcement Agencies was duly served, December 11, 2014, upon:

Stephen M. Campbell, Esq.
Julia K Martinez, Esq.
Assistant United States Attorneys
Eastern District of Virginia
2100 Jamison Avenue
Alexandria, Virginia 22314,

And all other defendants in this matter by the Court's electronic filing system.

_____/S/____

David P. Baugh